

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,
and THE STATES OF CALIFORNIA,
CONNECTICUT, FLORIDA, ILLINOIS,
MASSACHUSETTS, MICHIGAN, NEW
YORK, RHODE ISLAND, and TEXAS,
and the Government of PUERTO RICO,
ex rel. MSP WB, LLC and MICHAEL
ANGELO,

Civil Case No. 19-12165
Honorable Denise Page Hood
Mag. Judge Anthony P. Patti

Plaintiffs-Relators,

v.

STATE FARM MUT. AUTO. INS. CO.,
et al.,

Defendants.

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NOTICE OF CONSENT TO PARTIAL DISMISSAL

This action was brought under the *qui tam* provisions of the federal False Claims Act, 31 U.S.C. §§ 3729-3733, and the analogous false claims acts of California, Connecticut, Florida, Illinois, Massachusetts, Michigan, New York, Puerto Rico, Rhode Island and Texas (“the Plaintiff states”). On August 9, 2021, the United States and the Plaintiff states filed their notice of decision to decline to intervene in this action. ECF 22. The Court’s Amended Order regarding declination to intervene provided that if relator proposed dismissal, the court would

solicit written consent to dismissal from the Plaintiff states before ruling or granting its approval for dismissal. ECF 18, PageID.330; see also ECF 24.

On April 22, 2023, Relator Michael Angelo (“Relator Angelo”) filed a motion that appears to seek the voluntary dismissal of the claims he has asserted in this case against defendants State Farm Mutual Automobile Insurance Company, Dover Bay Specialty Insurance Company, HiRoad Assurance Company, State Farm County Mutual Insurance Company of Texas, State Farm Fire and Casualty Company, State Farm Florida Insurance Company, State Farm General Insurance Company, State Farm Guaranty Insurance Company, State Farm Indemnity Company, and State Farm Lloyds (the “State Farm Defendants”).

In the interests of justice, the Plaintiff states, through undersigned counsel, hereby consent to dismissal of Relator Angelo’s claims asserted against the State Farm Defendants in this case, without prejudice as to the Plaintiff states.

Undersigned counsel has obtained written consent to this dismissal from the Plaintiff states via electronic mail. The Plaintiff states note that to the extent there are other claims alleged in this case, apart from those alleged by Relator Angelo against the State Farm Defendants, the above-referenced consent of the Plaintiff states, at this time, is limited only to the dismissal of Relator Angelo’s claims against the State Farm Defendants in this case.

Respectfully submitted,

/s/Brendan Maturen

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Dated: May 31, 2023

CASES/19-0264789/LGL NOT.CONSENT.DISMISS.230531

PROOF OF SERVICE

I hereby certify that on May 31, 2023, I electronically filed the above document(s) with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record.

/s/ Julie Gerszewski

Julie Gerszewski, Legal Secretary
Health Care Fraud Division
State of Michigan